

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

---

ANNUAL COMPLIANCE REVIEW, 2020

Docket No. ACR2020

---

**UNITED STATES POSTAL SERVICE SUPPLEMENTAL RESPONSE TO  
UNITED PARCEL SERVICE INC.'S MOTION REQUESTING ACCESS TO  
NON-PUBLIC MATERIALS UNDER PROTECTIVE CONDITIONS**

(January 25, 2021)

The United States Postal Service (Postal Service) files this supplemental response to United Parcel Service Inc.'s (UPS) Motion Requesting Access to Non-Public Materials Under Protective Conditions (UPS' Motion).<sup>1</sup> On January 19, 2021, the Postal Service filed its response to UPS' Motion (Response).<sup>2</sup> As attachments to its Response, the Postal Service filed letters from six foreign postal operators objecting to UPS' Motion. After filing its Response, the Postal Service received two additional letters from foreign postal operators objecting to UPS' Motion. Although these letters do not necessarily reflect the views of the Postal Service in this matter, the Postal Service offers this information to the Postal Regulatory Commission (Commission) in the interest of informing its decision with respect to UPS' Motion. The Postal Service attaches these two letters, Attachments 1 and 2, to this Supplemental Response. Attachment 1 is a letter from the designated postal operator of France (La Poste S.A.), and

---

<sup>1</sup> United Parcel Service, Inc.'s Motion Requesting Access to Non-Public Materials under Protective Conditions, Docket No. ACR2020 (January 11, 2021). Concurrent with this response, the Postal Service files a motion for leave to file a supplemental response to UPS' Motion.

<sup>2</sup> United States Postal Service Response to United Parcel Service Inc.'s Motion Requesting Access to Non-Public Materials Under Protective Conditions, Docket No. ACR2020 (January 19, 2021).

Attachment 2 is an anonymous letter from a postal operator.<sup>3</sup> Accordingly, the Postal Service continues to request that the Commission take into account this correspondence from foreign postal operators, and further continues to urge UPS to reconsider and withdraw its request for access to USPS-FY20-NP2, USPS-FY20-NP3, USPS-FY20-NP7, USPS-FY20-NP9, USPS-FY20-NP14, USPS-FY20-NP22, USPS-FY20-NP23, and USPS-FY20-NP24.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Anthony F. Alverno  
Chief Counsel  
Global Business & Service Development

Mikhail Raykher  
Attorney

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1135  
(202) 268-4277  
Mikhail.Raykher@usps.gov  
January 25, 2021

---

<sup>3</sup> The postal operator that submitted Attachment 2 to the Postal Service specifically requested that its letter be treated as an anonymous objection to UPS' Motion. In response to this request, the Postal Service redacted all identifying information related to this operator from Attachment 2.